

MICHAEL B. LEE, ESQ.  
Nevada Bar No. 10122  
MICHAEL B. LEE, P.C.  
1820 E. Sahara Avenue, Ste. 110  
Las Vegas, Nevada 89104  
Telephone: (702) 477-7030  
Facsimile: (702) 477-0096  
Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

WMCV PHASE 3 SPE, LLC,  
Plaintiff,

v.

YU SHAN CO. U.S.A., LTD.,  
Defendant.

Case No: 2:17-cv-03053-GMN-VCF

**JOINT STATUS REPORT, REQUEST  
FOR STATUS CHECK, AND  
ORDER SETTING STATUS CHECK**

**JOINT STATUS REPORT**

Plaintiff WMCV PHASE 3 SPE, LLC (“Plaintiff” or “WMCV”), appearing by and through its attorneys, GREENBERG TRAURIG, LLP, and Defendant YU SHAN CO U.S.A. LTD. (“Yu Shan” or “Defendant”), appearing by and through its attorney of record, MICHAEL B. LEE, PC, hereby submit their Joint Status Report.

**I. ANTICIPATED MOTIONS AND/OR OTHER MATTERS WHICH REQUIRE THE ATTENTION OF THIS COURT.**

**Stipulation and Order to Dismiss Pursuant to Settlement Agreement**

On or about January 31, 2017, Plaintiff filed this action in the United States District Court, Eastern District of New York. Pursuant to stipulation and order, the case was subsequently transferred to this Honorable Court. As such, Plaintiff retained local counsel, GREENBERG TRAURIG, LLP, who substituted into the case on or about January 17, 2018. Similarly, Yu Shan retained local counsel, MICHAEL B. LEE, PC, who substituted into the case on or about March 14, 2018. Since substituting into the case, both Plaintiff’s and Yu Shan’s counsel worked diligently in attempting to settle Plaintiff’s claims against Yu Shan. Discovery was propounded by Yu Shan to Plaintiff on or about April 9, 2018, which were responded to by

1 Plaintiff on or about May 18, 2018. Additionally, on or about May 24, 2018, Plaintiff  
2 propounded discovery requests to Yu Shan. However, Yu Shan is yet to provide responses, as  
3 Plaintiff gave Yu Shan an open extension to respond as they tried to work toward settlement of  
4 this matter.

5 As of the filing of this Joint Status Report, the parties have tentatively resolved and  
6 settled this matter.. Plaintiff and Yu Shan have agreed to the material terms of the settlement  
7 agreement and are actively working on finalizing settlement documents. The settlement  
8 agreement is confidential, but Defendant Yu Shan agreed to provide a confession of judgment in  
9 the event of a breach of the settlement agreement. Plaintiff will hold the confession of judgment  
10 unless there is a breach, subject to the terms of the settlement agreement.

11 **II. STATEMENT BY COUNSEL OF ACTION REQUIRED TO BE TAKEN BY THIS**  
12 **COURT.**

13 The Parties anticipate finalizing and executing the settlement documents, including a  
14 stipulation and proposed order to dismiss this action, in short order. The Parties mutually request  
15 a status check be set in 60 days. Before the expiration of 60 days, the Parties will either submit  
16 the executed stipulation and proposed order dismissing this action for the Court's consideration,  
17 or submit a subsequent joint status report advising this Court of the status of the matter. .

18 **III. LIST OF ATTACHMENTS**

19 None.

20 DATED this 20 of July, 2018.

DATED this 20 of July, 2018.

21 MICHAEL B. LEE, P.C.

GREENBERG TRAURIG, LLP

22 /s/ Michael Lee

/s/ Alayne Opie

23 MICHAEL B. LEE, ESQ. (NSB 10122)

MARK E. FERRARIO, ESQ (NV Bar 1625)

24 1820 E. Sahara Ave. Ste. 110

ALAYNE M. OPIE (Nevada Bar 12623)

25 Las Vegas, Nevada 89104

3773 Howard Hughes Pkwy., Suite 400 N

26 Telephone: (702) 477-7030

Las Vegas, Nevada 89169

27 Facsimile: (702) 477-0096

*Attorneys for Plaintiff*

28 [mike@mblnv.com](mailto:mike@mblnv.com)

*WMCV PHASE 3 SPE, LLC*

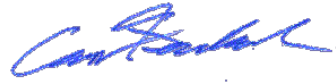
*Attorney for Defendant*

*Yu Shan Co. U.S.A. LTD.*

MICHAEL B. LEE, P.C.  
1820 E. SAHARA AVENUE STE. 110  
LAS VEGAS, NEVADA 89104  
TEL - (702) 477.7030; FAX - (702) 477.0096

1 IT IS HEREBY ORDERED that the Parties shall submit the executed stipulation and  
2 proposed order dismissing this action for the Court's consideration on or before September 17,  
3 2018. Alternatively, the Parties shall submit a subsequent status report on or before September  
4 17, 2018.

5 Dated this 20th day of July, 2018.

6  
7 

8  
9 Cam Ferenbach  
United States Magistrate Judge

10 Respectfully submitted,

11 MICHAEL B. LEE, P.C.

12 /s/ Michael Lee

13 MICHAEL B. LEE, ESQ. (NSB 10122)

14 1820 E. Sahara Ave. Ste. 110

15 Las Vegas, Nevada 89104

16 Telephone: (702) 477-7030

17 Facsimile: (702) 477-0096

18 [mike@mblnv.com](mailto:mike@mblnv.com)

19 Attorney for Defendant

20 Yu Shan Co. U.S.A. LTD.